



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

400 Seventh St., S.W.  
Washington, D.C. 20590

OCT 12 2004

Mr. Lee Robertson  
Advisory Scientist  
CROWN Packaging Technology  
11535 S. Central Avenue  
Alsip, IL 60803-2599

Reference No.: 04-0130

Dear Mr. Robertson:

This responds to your letter requesting clarification of the specification marking requirements for DOT specification 2P and 2Q containers in §§ 178.33-9 and 178.33a-9, respectively, of the Hazardous Materials Regulations (HMR; 49 CFR parts 171-180). Specifically, you ask if the markings may be affixed by visible ink jet printing on the container body and then covered by a plastic label. At our request, you also submitted two marked sample containers. In a recent telephone conversation with a member of my staff, you also asked if the specification marking may be printed on the removable product label covering the containers.

In accordance with § 178.3(a), a packaging represented as manufactured to a DOT or UN standard must be marked on an unobstructed area of a non-removable component of the packaging. Sections 178.33-9 and 178.33a-9 authorize printing the specification marking on the container as one of the methods for marking the 2P and 2Q containers. Printing the specification marking on a label affixed to the container with strong adhesion would satisfy this requirement. Additionally, as required by § 178.3(f), the markings must be accessible (not covered), permanent, contrasting, and legible. Markings made by jet printing are acceptable, if they meet the requirements. However, it is our opinion that the markings on your container, made by a series of dots, are not readily legible.

I trust this satisfies your inquiry.

Sincerely,

Hattie L. Mitchell  
Chief, Regulatory Review and Reinvention  
Office of Hazardous Materials Standards



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CROWN Packaging Technology  
11535 S. Central Avenue  
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May 10, 2004

Mr. Edward T. Mazzulo  
Director, Hazardous Materials Standards (DHM-10)  
U. S. Department of Transportation  
400 Seventh Street, S.W.  
Washington, DC 20590-0001

Dear Mr. Mazzulo:

The Code of Federal Regulations states that 2P and 2Q aerosol cans must be marked with the symbols DOT-2P or 2Q by printing, lithographing, stamping or embossing. The name or symbol of the person making the mark must also appear on the can.

We understand that including the symbols in the lithography applied to the can body or lithographing or printing them on the bottom of the can are acceptable and commonly used methods.

We also believe that visible ink jet printing on the can body under a plastic label is an acceptable method. We request written confirmation that this method is acceptable.

If there are any questions or a need for clarification, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Lee Robertson".

Lee Robertson  
Advisory Scientist

Phone: 708-239-5378  
Fax: 708-239-5350  
E-mail: [lee.robertson@crowncork.com](mailto:lee.robertson@crowncork.com)

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9-3-04

Mr. Edward T. Mazzulo  
Director, Hazardous Materials Standards (DHM-10)  
U. S. Department of Transportation  
400 Seventh Street, S. W.  
Washington, DC 20590-0001

RE: My letter to you 5/10/04  
Phone call from your office 8/5/04 to request can samples

Dear Mr. Mazzulo:

Enclosed are two can samples to illustrate the printing method described in my letter.

1. A 202/204/205x608 non-rated antiperspirant can with the plastic label partially removed so that the printing is visible. The manufacturing location, date and time information is printed by video jet.

23-1 05/03/02 11:14-2

2. A 200/201/202x700 DOT-2P can without a label. The following information is printed on this can.

48092 CCS 23-2 12/15/03 07:56 DOT-2P

Please let me know if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Lee Robertson".

Lee Robertson  
Senior Scientist

Phone: 708-239-5378  
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Email: [lee.robertson@crowncork.com](mailto:lee.robertson@crowncork.com)